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To damon_doumlele@nps.gov

cc

Subject From NPS.gov: Research on ORVs in Big Cypress

Email submitted from: matthew3222@yahoo.com at /bicy/parkmgmt/orv-advisory-committee.htm

Mailing Address
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February 21, 2010

Dear ORV Advisory Committee and Preserve Staff:

I've thought a number of times about the good discussion that took place at the last meeting of the ORV Advisory Committee on the use of science and research in decision making in the preserve. It seemed that there were two basic points of view presented: 1) More research was needed on the natural resources of the preserve - as well as visitor use - and how differing degrees of ORV use in the preserve impact these, and; 2) Data is already available to provide all the assistance in decision making that is needed.

In my few minutes in front of the committee, I attempted to explain that the research component of the Off-Road Vehicle Management Plan (ORVMP) is an integral part of that plan which allows for the scientific management of what NPS has consistently referred to as a 'high impact recreational activity' to take place. I made the point that even in areas where data does exist, that data is a far cry from a full scientific study which uses data to test (prove or disprove) a hypotheses - e.g. tire width of an ORV is inversely proportional to the impact of the vehicle on soil, vegetation and hydrology (or - the greater the width of the tire and lower the distributed weight - psi - the less damage will occur). Use of data is an important component of the scientific method, but it is a far cry from the method in and of itself. And opinions - even when based on extensive observation in the field - should be backed up by objective studies to be independently validated. When this particular issue was discussed by Lyle McCandless (tire width), I mentioned that my guess is that Lyle's assertion is correct - wider tires will be preferable to smaller ones with regard to vehicle impacts. But tire width is definitely one part of vehicle specifications that should be studied scientifically in Big Cypress so that concrete recommendations can eventually be implemented with the full rationale for a decision known.

The research study on the topic of vehicle specifications was listed as HIGH PRIORITY in the ORVMP.

Here is an important quote from the description of the proposed action (became the actual plan after the signing of the ORVMP's Record of Decision in 2000):

Proposed Action

"The proposed action applies the precautionary principle in managing recreational ORV use within the preserve. Although the National Park Service has used the best available scientific information available to prepare this plan, this database is not complete. The research section of the proposed action outlines where more information is needed. Where the effects of an action are unknown, the proposed management actions would favor the protection of the preserve's natural and cultural resources. The proposed action would be a model for sustainable management of a high-impact recreational activity in a sensitive area."

Two very important and related points are mentioned in this paragraph. First, that the scientific studies of ORV impacts called for in the plan are necessary to fill in gaps of knowledge with respect to ORV impacts on the preserve's natural resources - the preservation of which is the main reason for the preserve's existence. Second, where that knowledge - based on studies conducted according to the full scientific method - is missing, NPS would apply its own 'precautionary principle' and favor resource protection over use. I was surprised to hear the administration of the preserve diminish this call for research at the last meeting when it was stated that 'we're not starting from ground zero - we already have plenty of data'. Nevertheless, the administration should present this information in a study (which contains conclusions based on an analysis of data) which will allow the public to understand as well as predict what the actual outcomes of a given decision are likely to be. Guesswork with regard to the natural resources of Big Cypress should be kept to a minimum.

I would also point out that the administration of Big Cypress National Preserve missed a golden opportunity to apply the scientific method in its re-opening of the Bear Island ORV trails in 2007. The ORVMP stated in numerous locations that previous research indicated ORV damage to a given area of the preserve was positively correlated to the area's hydroperiod (i.e. the wetter the area, the more sensitive it is to the impacts of motor vehicle use). Damage was also correlated with soil type. See paragraph from the ORVMP below:

"Avoid or minimize trails through vegetation communities most susceptible to impacts. Some plant communities are highly sensitive to impacts from ORV use because of their soil and vegetative composition, hydroperiod, and/or the manner in which ORVs are operated in them. For instance, marl prairies have been identified as the vegetation community most sensitive to disturbance by ORVs. The soils in marl prairies are extremely soft when wet. Woody vegetation typically is absent in these areas, which promotes dispersal of ORVs to avoid heavily rutted areas. As a result, there has been extensive soil and vegetative disturbance throughout entire prairie systems. Adverse effects include widespread soil and vegetation disturbance and modification of water flow. These areas may require complete exclusion of ORV use to accommodate restoration."

As all users of the preserve are aware, areas of the Bear Island unit that were re-opened - eastern Bear Island and the Hinson Marsh - are extremely wet areas with long hydroperiods. They also contain extensive marl prairies and were closed in the first phase implementation of the ORVMP in 2000. Although those trails should never have been re-opened based on the above paragraph alone, a scientific study could have examined the baseline conditions prior to the re-opening and then looked at the impacts afterward in a comprehensive manner. Instead, all we received was an assurance from the preserve saying that the area 'could handle' the use followed up by a closure notice for one of the trails (and associated secondaries) when the damage became obvious. The wide swaths of compacted soil and destroyed vegetation on the Cypress Camp Trail and the enormous hole (4 to 5 feet deep) that opened up on the Hinson Trail (in addition to deep impacts on other sections of that trail, the Plains Trail, and secondaries) clearly indicated that the resource could not 'handle it'. This was predicted by previous studies noted throughout the ORVMP and shows how scientific methodology can definitely improve management decisions inside the preserve - if they are in fact utilized for that purpose.

Thank you all for your service and dedication to the Big Cypress National Preserve. I repeat my request from my earlier letter to this committee (November of 2009). The preserve administration should push vigorously for whatever resources are needed to carry out and complete the research studies elaborated in Table 3 of the ORVMP. The ORV Advisory Committee should have the benefit of the results of those studies in order to best conduct their work.

Sincerely,

Matthew Schwartz

Sierra Club